



The Partnership for America's Children submits these comments to the National Advisory Committee for the Census Bureau for its May 2022 meeting. The Partnership's mission is to support its network of state and community multi-issue child advocacy organizations in effective advocacy. The Partnership has 49 member organizations in 40 states that advocate to improve policies for children at the state, local and federal level. Collectively they represent over 90% of the nation's children. Partnership members use Census data in their advocacy, and thirty Partnership members are also KIDS COUNT grantees in their state, serving as that state's data hub on children for policy makers, administrators, and nonprofits.

The Partnership for America's Children served as the national hub on the undercount of young children in the 2020 Decennial Census. In this role the Partnership formed and continues to co-lead a national working group of child-serving organizations that is working to improve the count of young children in all Census Bureau demographic products. Based on the planned agenda, we make the following recommendations. It would be much appreciated if the Bureau could produce the slides for the NAC meetings a few days in advance, so that we can provide more helpful comments.

1. *We are very pleased that the Bureau has created a Cross-Directorate team on the undercount of young children. We suggest the team should include in its work the following activities, and include a focus on the undercount of young Hispanic and Black children, who are missed at more than double the rate of White children. For that purpose, we suggest that they include stakeholders from these communities.*
 - a. *reviewing ideas and recommendations from the 2020 Census taskforce on the young child undercount to see which ideas could not be implemented in 2020 for lack of time but might be included in 2030 planning,*
 - b. *assessing the effectiveness of the mailing to communities at high risk of missing young children in 2020,*
 - c. *assessing other efforts to count young children,*
 - d. *assessing the impact of operational decisions on the count of young children,*
 - e. *building a research plan to assess at the substate level where young children were missed most often, and what factors correlate with high levels of missing young children,*
 - f. *assessing whether the rate at which young children of color were left off even when families respond changed in 2020 compared to 2010, or whether the change in the count of young children was primarily due to lessened response rates in those communities,*
 - g. *updating the studies done by the undercount of young children research team between 2015 and 2019*

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h. *Evaluating the use of administrative records in 2020 and the potential use of administrative records for evaluating 2020 related to young children*

The recent release of the Demographic Analysis data shows that the 2020 Census had an even bigger net undercount of young children than the 2010 Census, and preliminary analysis of the count of all children by Dr Bill O'Hare suggests that the proportion of Black and Hispanic children missed in 2020 is likely to be even worse than it was in 2010. This makes it even more urgent to get the cross-directorate team functioning; we know that team members have been named but as far as we know it has not yet been given a specific charge and scope of responsibilities.

2. *The Bureau should include external groups in the planning process for the 2030 Census and publicize the opportunities for stakeholder engagement in this process.* The 2020 Census engaged an extraordinarily wide range of stakeholders, and the insights they learned from participating in the 2020 Census should inform planning for 2030.
3. *Each data set on children in the DHC should have a statement explaining that this data set did not preserve the relationship between children and adults and either directing the user to a data set in the DDHC where the relationship is preserved or say that such data is not available. Otherwise, people will use the data for analyses for which it is not fit.*
4. *For the DHC, the Bureau should assess the accuracy of the count of children for below county geographies when differential privacy is applied, including by race and ethnicity, and report on it.* If, as some preliminary research shows, the error rates when differential privacy is applied are particularly high for children of color because of the smaller size of the groups, the Census Bureau should assess the equity concerns generated by the use of differential privacy and the higher error rates for these groups. The Bureau should assess whether they can adjust differential privacy to reduce the error rates for children of color, or whether the error rates are so high that adjustments won't help.
5. *For the DDHC, we encourage the Bureau to provide below county data for large counties, which should be possible without creating privacy concerns.* It seems problematic to limit the data available on communities within San Bernardino County, for example, with over 2 million people, just because some counties have only a few hundred people.
6. *For the DDHC, we recommend that the Bureau replicate the table about own children by family type for race and ethnicity. This is the most critical measure of child well-being from the Decennial Census.* The Bureau did not provide this table for race and ethnicity in 2010 but given that many race groups have increased from 2010 to 2020 we believe that the 2010 precedent should not be the basis for the 2020 decision.
7. *We encourage the Bureau to produce information on how to interpret the DDHC for family structure, and to refer people to the National Survey on Children's Health for more information on this point, because of problems with what we know about family structure from the 2020 Census and the ACS in terms of children living with unmarried partners.* This family formation is growing rapidly. The current census questionnaire doesn't accurately capture the family structure and thus the data reporting will be misleading unless the Bureau explains it better. Fortunately, the Bureau has another data source it can refer people to in the NSCH.

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- a. If the child is the child of both partners, (or possibly the grandchild of both partners) this will not show up in Census or ACS data. Since one of the parents or grandparents isn't listed as householder, and is unrelated to the householder, the data will report the child as living only with one parent or grandparent. This will be incorrect for many families. Since the questionnaire used in 2020 won't capture the relationship of the child to the nonhouseholder parent or grandparent, files with this data should at least explain that the child may or may not be living with both parents or grandparents.
 - b. When the child is only related to the non- householder partner, we are uncertain where the data will appear. Will the child be included in the "own data"? As best we can tell, in these families, children living with one parent (or grandparent) and that adult's unmarried partner will arbitrarily show up in the data either as living with a parent or grandparent or living with an unrelated adult, solely based on whether the relative or the nonrelative adult was identified as the householder on the form. The Bureau needs to direct people to looking at both tables and explain the data problem. It should also refer them to the NCHS for information on this point.
8. *The Bureau should make a commitment to wait to apply differential privacy to the American Community Survey until it can be sure it will maintain the joins between children and adults, because that data is essential for producing child poverty data, the single most important indicator of well being for children.* Given that the Bureau is still working out the challenges in maintaining the joins between children and adults in the decennial census data, and will now be producing the DDHC that includes such data as late as 2024, only a year before it proposes to apply differential privacy to the ACS, we think it is essential to commit to continuing to produce the child poverty data.
 9. The Bureau has set a goal of providing the same amount or more data from the- 2020 Census as the 2010 Census. *The Bureau should consider setting a goal of providing the most useful data from the 2020 census, not merely the most data. Given that the Bureau is allocating a privacy budget, and making choices of which data to release, the value of the data should be considered.*
 10. *The Bureau should replicate the DDHC table about own children by family type for race and ethnicity.* This is the most critical measure of child well-being from the Decennial Census. It will likely show significant change since many race groups have increased from 2010 to 2020.
 11. *We are very concerned that the decision to limit household size in the DDHC for the join data will mask the prevalence of overcrowded housing and will reduce the count of some communities and populations.* We note that for low-income families, household overcrowding is a severe problem. In many communities and cultures, extended families live in one household.
 12. *The Bureau should identify approaches and conduct research investigating why, in the 2020 Census, response rates in predominantly Black and Hispanic tracts dropped.* Recent research suggests that this was a significant problem.
 13. *The Bureau should release 2020 Census sub state data that would allow stakeholders to research variations in coverage error by race and ethnicity.* If the Bureau thinks that this data

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release would breach differential privacy, it should identify appropriate sworn researchers to conduct such research. And if the Bureau finds it impossible to identify researchers to conduct this research, it should conduct the research in house and release the results, which should not violate any differential privacy requirements.

14. Given that the blended base for population estimates has important implications for the equitable allocation of federal funding, *we urge the Bureau to undertake to assess whether use of the blended base will change the count of Black populations and Hispanic populations, and of other racial and ethnic groups compared to use of Decennial Census data.* We commend the Bureau for focusing on the improvement in the data for young children in the blended base method in their recent publication on this topic.

15. *We urge the Bureau to research the accuracy of rosters using administrative data with respect to young children and to share with stakeholders its methods for determining household rosters when different sets of administrative data produce different household members. We also encourage the Bureau to research the accuracy of the household rosters in households counted using administrative data compared to households that responded on their own and households counted during NRFU by enumerators, particularly with respect to young children.* The quality of these data are important because over 5% of all households in the 2020 Census were counted using administrative data, and because the Bureau is exploring ways to expand its use of administrative data. We note that the definition of household varies for income tax purposes, SNAP households, and others. Because so many households have extended families, complex households, or multiple households sharing one residence, it is essential to make sure that everyone in a residence is counted and that people who show up in only some records are still included.

We hope these comments are helpful and appreciate the opportunity to submit them. Should you have any questions, please contact me at dstein@foramericaschildren.org

Sincerely,

Deborah Stein, Network Director